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Attorneys for Defendant
DAVID COCHRAN

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND

DENISE TAVARES,

CASE NO.: 4:20-cv-01704-HSG

Plaintiff,

**STIPULATION AND ORDER
MODIFYING CASE MANAGEMENT
DEADLINES**

vs.

DAVID COCHRAN, in his official capacity as a County of Alameda Sheriff Deputy, and DOES 1-25, inclusive.

Crtrm: 2, 4th Floor
Judge: Hon. Haywood S. Gilliam, Jr., Presiding

Defendants.

Date Action Filed: March 9, 2020
Trial Date: June 28, 2021

WHEREAS the parties have been cooperating and working diligently on completing discovery including depositions of the parties and witnesses.

WHEREAS, certain depositions which the parties expect will be relied upon by experts were completed on December 16, 2020; however, transcripts have not yet been received.

WHEREAS, the deposition of one eyewitness, B.J. Coleman, was noticed well in advance of the fact discovery cutoff; however, that witness was reportedly out of state in December and not returning until mid-January, such that her deposition has not yet been completed.

WHEREAS the parties have agreed and stipulated to modify the Case Management

1 deadlines contained in the Scheduling Order filed on June 25, 2020 (Document #22). The current
 2 trial date of June 28, 2021 is not affected.

3 Pursuant to local rule 6-1 and 6-2 the parties stipulate and propose the following
 4 modifications to the Case Management deadlines:

EVENT	CURRENT DATE	PROPOSED DATE
Exchange of Opening Expert Reports	January 8, 2021	January 22, 2021
Exchange Rebuttal Expert Reports	January 22, 2021	February 5, 2021
Close of Expert Discovery	February 8, 2021	February 22, 2021

10 Additionally, the parties agree that fact discovery may remain open, but only for purposes of
 11 completing the deposition of eyewitness, B.J. Coleman.

12 It is so stipulated.

14 Dated: January 8, 2021

POINTER & BUELNA, LLP
 LAWYERS FOR THE PEOPLE

16 By /s/ Patrick M. Buelna
 17 Patrick M. Buelna, Esq.
 Counsel for Plaintiff

18 Dated: January 8, 2021

EDRINGTON, SCHIRMER & MURPHY LLP

20 By /s/ Timothy P. Murphy
 21 Timothy P. Murphy, Esq.
 Attorney for Defendant
 DAVID COCHRAN

23 **ORDER**

24 Good cause appearing, it is so ordered.

25 DATED: 1/12/2021

26 By 
 27 HON. HAYWOOD S. GILLIAM, JR.
 United States District Court Judge